

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT # F-05-006 (R1)
EMERSON POWER TRANSMISSION CORPORATION
MAYSVILLE, KENTUCKY
NOVEMBER 24, 2006
FROUGH SHERWANI
PLANT I.D. # 21-161-00001
AI # 3005

Revision 1 (Permit # F-05-006 (R1))
Minor Permit Revision

On July 10, 2006 the source applied to the Division for the installation of a solvent distillation unit called "The Minimizer" and four paint gun cleaners. The solvent distillation unit (Model 709 MinimizerTM) is a closed system that recycles the spent solvents while no VOC are emitted into the atmosphere (except opening and closing). The paint gun cleaners will automate the cleaning process at each manual spray booth.

On October 11, 2005 the source has also applied to the Division to revise the permit to reflect actual emissions points.

In addition, on September 12, 2005 the source submitted an application to add a new Lacquer-based paint to their operation. No VOC/HAPS emission increase is expected from this change. Also, the VOC/HAPS caps will remain the same.

PERMIT # F-05-006

Source Description

Emerson Power Transmission Corporation of Maysville, Kentucky, currently operates three plants that manufacture drive train components.

COMMENTS;

Emerson Power Transmission Corporation of Maysville, Kentucky, currently operates three plants that manufacture drive train components. The source is consolidating processes from two plants (Plant 1 (021-161-00001) and Plant 3 (021-161-00030)) and discontinuing operations in one (Plant 2 (021-161-00029)). The existing three plants have permits # O-86-38, O-94-007, S-96-223 (Revision 2) and VS-04-003. The consolidated plant (021-161-00001) will have conditional major permit F-05-006. With the consolidation of the plants, the source is proposing to add three spray booths and 11 combustion sources.

Once construction is over the plant will have two powder coat lines, six spray booths, parts washer, welding sources, sandblasting, arc cutting, machining and coolant, space heaters, and combustion sources.

Type of control and efficiency:

EP 01	Powder Coat Line	
	• Control Equipment	Filters
	• Estimated Control Efficiency	98%
EP 02	Powder Coat Line	
	• Control Equipment	Filters
	• Estimated Control Efficiency	98%
EP 03	Manual Spray Booth	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
EP 04	Manual Spray Booth	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
EP 05	Manual Spray Booth	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
EP 06	Manual Spray Booth	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
EP 07	Manual Spray Booth	
	• Control Equipment	Filters
	• Estimated Control Efficiency	80%
	• Estimated Transfer Efficiency	50%
EP 09	Machining (5 Mills)	
	• Control Equipment	Bag Filters/Dust Collector
	• Estimated Control Efficiency	95%
	Machining (9 Mills)	
	• Control Equipment	Amtech Dust Collector
	• Estimated Control Efficiency	95%
	Machining (5 Mills)	
	• Control Equipment	Dust Collector
	• Estimated Control Efficiency	95%

Emission factors and their source:

A combination of material balances and AP-42 emission factors were used to estimate emissions.

Applicable regulations:

- a. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975);
- b. **401 KAR 63:020**; Potentially hazardous matter or toxic substances, applicable to each affected facility which emits or may emit potentially hazardous matter or toxic substances.
- c. **401 KAR 52:030**. Federally-enforceable permits for nonmajor sources.

Precluded Regulations:

- a. **401 KAR 59:225**, New miscellaneous metal parts and products surface coating operations.
- b. **40 CFR 63 Subpart M**, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 60 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.

PERIODIC MONITORING:

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 month emission limitations.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or record keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.